

# **EXHIBIT 3**

October 02, 2020

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- ADAM LIEF -

IN THE UNITED STATES DISTRICT COURT.  
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X  
ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655(LGS)(GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: October 2, 2020

TIME: 11:37 A.M.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF ADAM LIEF, held via Zoom, pursuant to Notice,  
before Hope Menaker, a Shorthand Reporter and  
Notary Public of the State of New York.

(Confidential portion appears on pages 135-137)

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1                   - ADAM LIEF -

2   you were dealing with cloud-based or

3   on-premises-based systems?

4       A.   They were on-premises-based systems.

5       Q.   Okay. In 2011, did you leave Oracle?

6       A.   Yes, I did.

7       Q.   And where did you go from there?

8       A.   I went to Google.

9       Q.   And what role did you take at Google  
10   at that time?

11      A.   I was an application engineering  
12   manager -- excuse me, let me correct that, please.  
13   I was a business systems integration manager, the  
14   role was called.

15      Q.   And where did that business systems  
16   integration manager role sit within the broader  
17   Google structure?

18      A.   It was in Google's corporate  
19   engineering organization.

20      Q.   And did Google corporate engineering  
21   roll up into anything else; what entity was that a  
22   part of?

23      A.   At -- at the time, corporate  
24   engineering rolled up into Google's technical  
25   infrastructure group.

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1 - ADAM LIEF -

2 Q. Did that change at some point?

3 A. Yes, it did.

4 Q. When did it change?

5 A. I am not -- I -- I don't recall the

6 precise time frame, but let me think.

7 I'm sorry, I don't -- I don't recall

8 the -- the time frame.

9 Q. Was it within the last five years?

10 A. Yes.

11 Q. Do you recall whether it was in the

12 last two years?

13 A. I don't. I don't -- I don't recall.

14 Q. And what did it change to?

15 A. It first changed to cloud, being

16 directly under cloud.

17 Q. And then did it change again?

18 A. Yes, it did.

19 Q. And where did it change to next?

20 A. It moved to core systems.

21 Q. C-O-R-E?

22 A. That's correct.

23 Q. Okay, and how long were you in the

24 business systems integration manager role?

25 A. I was there for about four-and-a-half

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1 - ADAM LIEF -

2 A. Yes, it is a file on Google's

3 internal network.

4 Q. And so have you, yourself, accessed

5 that document before?

6 A. Yes, I have.

7 Q. And can you walk me through the steps

8 that you would take to access that document?

9 A. You --

10 MR. GAGE: Again, object for the

11 record. I don't think this is within the

12 subject of this witness' designation.

13 But go ahead.

14 A. Yes, I would do an internal search

15 for the document within Google's search tool and

16 then open the file.

17 Q. And when you talk about the internal

18 search tool, is that a search tool within a

19 particular system?

20 A. It's Google-wide; it's a Google-wide

21 internal search tool.

22 Q. And what information is reflected in

23 the ladder document that you described?

24 A. Reflected are expectations of

25 different levels of jobs within the ladder.

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1                   - ADAM LIEF -

2           your role?

3           A.     No.

4           Q.     Is your position presently within

5           Google Cloud?

6           A.     No.

7           Q.     At the time your role was moved

8           from -- was it from Google Cloud to Google Tech

9           Infrastructure, is that the move that was made?

10          A.     It -- it --

11          Q.     Sorry. At the time your role moved

12          from cloud to core systems, did the role itself

13          change in any way?

14          A.     No.

15          Q.     The systems and applications with

16          which you're involved in your role, are those

17          internal or external?

18          A.     Internal.

19          Q.     And are those cloud based or on-prem

20          based?

21          A.     They are both.

22          Q.     Now, I think we discussed before that

23          the systems you worked with at Oracle were on-prem

24          based. Was this your first experience working

25          with applications that were cloud based at Google?

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1 - ADAM LIEF -

2 can answer that generally.

3 Q. For application engineering  
4 directors, is it a salary or an hourly position?

5 A. Salaried position.

6 Q. And, on average, do application  
7 engineering directors work more than 40 hours in a  
8 week?

9 MR. GAGE: Objection.

10 A. I don't know.

11 Q. During the time when people actually  
12 went to an office back pre-pandemic era, were  
13 you -- would application engineering directors  
14 work more than 40 hours in a week?

15 MR. GAGE: Objection. I think this  
16 is beyond the scope of the witness'  
17 designation.

18 But go ahead.

19 A. Yeah, I -- I don't know.

20 Q. For yourself as an application  
21 engineering director, do you work more than 40  
22 hours in a week?

23 A. Yes, I do.

24 Q. With respect to application  
25 engineering directors at Level 8 -- well, before

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1 - ADAM LIEF -

2 we get to that, I'm going to stop and I'm going to  
3 pause and define another term. Are you familiar  
4 with the term "Googlely"?

5 A. Yes, I am.

6 Q. And can you define that term for us  
7 as it's used at Google?

8 A. Yes, it would be somebody that  
9 adheres to the cultural attributes important to  
10 Google.

11 Q. Okay. So with respect to the  
12 application engineering director Level 8, would  
13 you agree that individuals in that position would  
14 be expected to have the qual -- the quality of  
15 innovative thinking?

16 A. Yes.

17 Q. Would that also be true with respect  
18 to application engineering directors at Level 9?

19 A. Yes.

20 Q. With respect to application  
21 engineering directors at Level 8, would they be  
22 expected to have a quality of collaboration?

23 A. Yes.

24 Q. And would that also be true of Level  
25 9?



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1 - ADAM LIEF -

2 A. Yes.

3 Q. With respect to application  
4 engineering directors at Level 8, would they be  
5 expected to exhibit the quality of being  
6 comfortable in solving ambiguous problems?

7 A. Yes.

8 Q. Would that also be true with respect  
9 to Level 9?

10 A. Yes.

11 Q. With respect to application  
12 engineering directors at Level 8, would -- and  
13 their skills, would they be expected -- would they  
14 be required to be highly technical --

15 A. Yes.

16 Q. -- with a sound track record of  
17 applying technology to solve business problems?

18 MR. GAGE: Objection.

19 A. Yes.

20 Q. Would that also be true of Level 9s?

21 MR. GAGE: Objection.

22 A. Yes.

23 Q. With respect to application  
24 engineering directors at Level 8, would a criteria  
25 be that they be team-oriented leaders who have

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1 - ADAM LIEF -

2 leveraged organizational depth across functions?

3 MR. GAGE: Objection.

4 A. Yes.

5 Q. And would that also be true with

6 respect to Level 9s?

7 MR. GAGE: Objection.

8 A. Yes.

9 Q. With respect to criteria for

10 application engineering directors at Level 8,

11 would they be expected to demonstrate a history of

12 sharing lessons learned with peers and internal

13 stakeholders?

14 MR. GAGE: Objection.

15 A. Yes, if they've been in the role for

16 some time.

17 Q. Would the same be true with respect

18 to Level 9s?

19 MR. GAGE: Objection.

20 A. Yes.

21 Q. With respect to application engineers

22 at Level 8, is the criteria that the -- is the

23 criteria that they be thought leaders with a deep

24 track record of accomplishments related to cloud

25 analytics and/or machine learning?

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2 MR. GAGE: Objection.

3 A. That isn't a generalizable  
4 requirement across domains outside of cloud  
5 so -- so, no, is the answer.

6 Q. With respect to application engineer  
7 Level 8, are they expected or is the criteria that  
8 they have the ability to work independently with  
9 minimal guidance?

10 MR. GAGE: Objection.

11 A. Yes.

12 Q. And is that also true of Level 9s?

13 MR. GAGE: Objection.

14 A. Yes.

15 Q. Are application engineer Level 8s  
16 expected to know how to design and deliver complex  
17 applications or services?

18 MR. GAGE: Objection.

19 A. Yes.

20 Q. And is that also true of Level 9s?

21 MR. GAGE: Objection.

22 A. Yes.

23 Q. With respect to application engineer  
24 Level 8s, is a criteria they have experience with  
25 multiple design proc -- multiple software design

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1 - ADAM LIEF -

2 methodologies?

3 MR. GAGE: Objection.

4 A. Yes.

5 Q. Is that also true of Level 9s?

6 MR. GAGE: Objection.

7 A. Yes.

8 Q. With respect to application engineer

9 Level 8s, are they expected or is a criteria that

10 they have an understanding of the challenges

11 related to scale, feed, and user expectations?

12 MR. GAGE: Objection.

13 A. Yes.

14 Q. Is that also true of Level 9s?

15 MR. GAGE: Objection.

16 A. Yes.

17 Q. With respect to application engineer

18 Level 8s, is a criteria -- is the criteria that

19 they be creative, serious, and deliberate

20 problem-solvers?

21 MR. GAGE: Objection.

22 A. Yes.

23 Q. Is that also true of Level 9s?

24 MR. GAGE: Objection.

25 A. Yes.

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1 - ADAM LIEF -

2 Q. With respect to application engineer

3 Level 8s, is the criteria that they know how to

4 lead through influence?

5 MR. GAGE: Objection.

6 A. Yes.

7 Q. Is that also true with respect to

8 Level 9s?

9 MR. GAGE: Objection.

10 A. Yes.

11 Q. With respect to application engineer

12 Level 8s, is the criteria a willingness to have an

13 opinion regarding design and/or deployment

14 considerations?

15 MR. GAGE: Objection.

16 A. Yes.

17 Q. Is that also true with respect to

18 Level 9s?

19 MR. GAGE: Objection.

20 A. Yes.

21 Q. Speaking from your personal

22 observations with respect to Google, the criterion

23 qualities that's we just went through in that

24 list, is that true of anyone at the director level

25 with respect to an engineering role?

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1 - ADAM LIEF -

2 MR. GAGE: Objection.

3 A. Yes.

4 Q. In the application engineer director

5 role, is there an internal client base that is

6 served?

7 A. Yes.

8 Q. And who are the clients?

9 A. The clients are the business

10 stakeholders that operate Google's business.

11 Q. Can you give me some examples?

12 A. Yes. The head of HR would be one of

13 my stakeholders.

14 Q. Who would be another of your

15 stakeholders?

16 A. Her senior leaders.

17 Q. And who would those be?

18 A. The head of staffing, the head of

19 talent, the head of operations. Some examples.

20 Q. And do other application

21 engineer -- application engineering directors have

22 similar stakeholders that they serve in their

23 roles?

24 A. Yes, they do.

25 Q. So each application engineering

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1                   - ADAM LIEF -

2       director has clients or stakeholders that they  
3       serve, but the stakeholders may be different from  
4       one to another; is that right?

5           A.     That's correct.

6           Q.     Are you familiar with the term  
7       "whiteboarding sessions"?

8           A.     Yes, I am.

9           Q.     And -- and what do you understand  
10      that to mean?

11          A.     I understand that to mean being able  
12      to collaborate and draw out concepts, either  
13      design or user-experience concepts.

14          Q.     And do application engineering  
15      directors engage in whiteboarding sessions with  
16      their stakeholders?

17          A.     They can.

18          Q.     Is that a part of the role?

19          A.     It might not be a universal part of  
20      the role.

21          Q.     Is it a part of your role?

22          A.     No.

23          Q.     Do you meet with your business  
24      stakeholders to discuss and assess what their  
25      needs are and how you can meet those needs?

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1 - ADAM LIEF -

2 A. Yes, I do.

3 Q. Do all application engineering  
4 directors have similar-type conversations with  
5 their stakeholders?

6 MR. GAGE: Objection.

7 A. To my knowledge, yes.

8 Q. Do application engineering directors  
9 work on cross-Google technical teams?

10 MR. GAGE: Objection.

11 A. I made need clarity on what's been  
12 referred to as a cross-Google technical team.

13 Q. What do you understand that term to  
14 refer to?

15 A. I --

16 MR. GAGE: Objection.

17 A. I would understand it to be technical  
18 stack development or tools that engineers will use  
19 that are used by many different groups.

20 Q. In -- let me ask a different  
21 question. Do application engineering directors  
22 work with people outside of their immediate job  
23 ladders?

24 MR. GAGE: Objection.

25 A. Yes, they do.



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1 - ADAM LIEF -

2 Q. And does that include other  
3 engineering teams across Google?

4 A. It -- it may depending on the role.

5 Q. In your -- excuse me, application  
6 engineering directors, do they have -- does any  
7 aspect of their job involve public speaking,  
8 whether it's -- it's internal public speaking or  
9 external public speaking?

10 A. Yes.

11 Q. And what's involved with respect to  
12 public speaking in the role of application  
13 engineering manager -- I'm sorry, application  
14 engineering director?

15 A. It might be communicating a program  
16 overview or a status update.

17 Q. And so is a criteria for application  
18 engineering director Level 8 role that a person be  
19 comfortable in that public speaking role?

20 MR. GAGE: Objection.

21 Q. I'm going to withdraw it and ask you  
22 a different question.

23 Is a criteria that they be able to  
24 effectively perform a public speaking role for the  
25 application engineering Level 8?

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1 - ADAM LIEF -

2 MR. GAGE: Objection.

3 A. Yes. I'd say yes.

4 Q. Is that also true with respect to

5 Level 9s?

6 A. Yes.

7 Q. Is a criteria for application

8 engineering Level 8 excellent communication

9 skills?

10 MR. GAGE: Objection.

11 A. Yes.

12 Q. And is that also true with respect to

13 Level 9s?

14 MR. GAGE: Objection.

15 A. Yes.

16 Q. Is a criteria with respect to the

17 application engineering Level 8 role a commitment

18 to followthrough?

19 MR. GAGE: Objection.

20 A. Yes.

21 Q. Is that also true with respect to

22 Level 9s?

23 MR. GAGE: Objection.

24 A. Yes.

25 Q. You mentioned the stakeholders that

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1 - ADAM LIEF -

2 the business application -- or, I'm sorry, the  
3 application engineering directors work with. Do  
4 the application engineering directors serve as  
5 technical advisors to their stakeholders?

6 MR. GAGE: Objection.

7 A. Yes.

8 Q. And is that true with respect to both  
9 Level 8 and Level 9?

10 A. Yes.

11 Q. With respect to application  
12 engineer -- engineering Level 8, do part of their  
13 responsibilities include identifying friction  
14 points in design, development, or deployment from  
15 the stakeholders' perspective?

16 MR. GAGE: Objection.

17 A. Yes.

18 Q. And is that also true with respect to  
19 Level 9s?

20 MR. GAGE: Objection.

21 A. Yes.

22 Q. With respect to application engineer  
23 Level 8, is a responsibility of the position to  
24 work with their stakeholders to define joint  
25 initiatives?

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1 - ADAM LIEF -

2 MR. GAGE: Objection.

3 A. That depends on the stakeholder.

4 Q. It can be, but it's not always a part  
5 of the role; is that what you're saying?

6 MR. GAGE: Objection.

7 A. That's correct.

8 Q. Is that true with -- with respect to  
9 both Level 8s and Level 9s?

10 A. Yes.

11 Q. With respect to application engineer  
12 Level 8s, is a responsibility to collaborate  
13 across functional and product area boundaries  
14 within Google?

15 MR. GAGE: Objection.

16 A. Yes.

17 Q. Is that also true with respect to  
18 Level 9s?

19 MR. GAGE: Objection.

20 A. Yes.

21 Q. With respect to application  
22 engineering Level 8, do they work with product  
23 engineering teams?

24 A. They may.

25 Q. Is that true at both Level 8 and

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1 - ADAM LIEF -

2 Level 9?

3 A. Yes.

4 Q. Now, with respect to the business  
5 stakeholders that the application engineers  
6 support, are the business stakeholders an  
7 engineering role?

8 MR. GAGE: Objection.

9 A. Mostly not, but they may be.

10 Q. So for instance the head of HR, that  
11 is not an Eng role, correct?

12 A. That is correct.

13 Q. And sales would not be an Eng role,  
14 correct?

15 MR. GAGE: Objection.

16 A. I don't know.

17 Q. What about operations, is that  
18 generally considered an Eng role or something  
19 else?

20 MR. GAGE: Objection.

21 A. I need clarity on what you mean by  
22 "operations."

23 Q. As that term is used, if someone says  
24 I'm in operations or I'm in Ops, is that  
25 understood to be an engineering role or a

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1                   - ADAM LIEF -

2           Q.    It's not a manufacturing role,  
3 correct?

4           A.    Correct.

5           Q.    Or a hospitality role or anything  
6 like that, but is -- is that true with respect to  
7 Level 9s as well?

8           A.    Yes, it's true.

9           Q.    And in the technology role or  
10 in -- the application engineering Level 8s, does  
11 a large part of their work require the use of a  
12 computer?

13          A.    Yes.

14          Q.    Is most of the work done on the  
15 computer?

16          A.    Yes.

17          Q.    Is that true with respect to Level 9s  
18 as well?

19          A.    Yes.

20          Q.    At this point in time, are  
21 application engineers at Levels 8 and 9 working  
22 remotely?

23          A.    Most are, yes.

24          Q.    Do all of them have the option to  
25 work remotely?

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1 - ADAM LIEF -

2 common responsibility for application engineers at  
3 the director level?

4 A. It is -- it is a common expectation,  
5 but I -- because I don't know those roles very  
6 specifically, I can't comment on what exactly the  
7 responsibilities were, but the expectation is  
8 correct.

9 Q. What other job responsibilities is  
10 common across the application engineer director  
11 role?

12 A. So the common expectations for the  
13 role would be a focus on support, deployment,  
14 implementation of internal systems for Google,  
15 managing large programs, and interacting with  
16 stakeholders and partners.

17 MS. GREENE: And, Ms. Menaker, if you  
18 could be so kind to read back that response.

19 (The answer requested was read back  
20 by the reporter.)

21 Q. And when you say support of internal  
22 systems, can you tell me what you mean by that?

23 A. I mean maintenance tasks necessary to  
24 keep those internal systems running.

25 Q. And when you say deployment of

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1                   - ADAM LIEF -

2   intern -- of internal systems, what do you mean by  
3   that?

4       A.    Deployment could include development,  
5   design, testing, and actual releasing of systems  
6   and enhancements.

7       Q.    And when you say -- and when you say  
8   "systems," you're referring to technology systems;  
9   is that correct?

10      A.    Yes, that's correct.

11      Q.    And when you refer to the  
12   implementation of internal systems, what do you  
13   refer to there?

14      A.    There's a lot of overlap with  
15   deployment, but it may also involve third-party  
16   system implementation as well.

17      Q.    When you refer to "managing large  
18   programs," what do you mean by that?

19      A.    A highly-impactful initiative that  
20   will introduce a lot of change into the  
21   environment.

22      Q.    Can you give me some examples?

23      A.    Sure. We have a finance  
24   transformation program that is replacing much of  
25   Google's core finance processes and systems. That



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1                   - ADAM LIEF -

2 is one that Jannie Affeld is managing.

3       Q.    Are there any other expectations that  
4 are common to all application engineering  
5 directors?

6       A.    Yes, as referred to in the job  
7 ladder.

8       Q.    Okay. We're going to try our luck at  
9 another document. We seemed to have done the last  
10 one so well, let's see if we can repeat it.

11           MR. GAGE: Again, tell us when you  
12 think we should see it.

13           MS. GREENE: We're making sure it's  
14 the right document first.

15       Q.    Okay. If you refresh, it should be  
16 there now. So I would like to draw your attention  
17 to an Excel spreadsheet, which we'll be marking as  
18 Exhibit 3. The Bates stamp number which does not  
19 show up in the spreadsheet is GOOG-ROWE-00058455.

20           (Whereupon, Exhibit 3 was marked at  
21 this time.)

22       Q.    Now, I appreciate that this is very  
23 small when you first open it, but I believe you  
24 can adjust -- at the bottom of screen there should  
25 be a way to adjust the magnification, and if

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1                   - ADAM LIEF -

2   you -- you should be able to go full screen as  
3   well to better see the document.

4           MR. GAGE: Cara, on the one I'm  
5   looking at, it looks like there's a lot cut  
6   off on some of these cells. Is there  
7   something I should --

8           MS. GREENE: Yeah, looks like it's  
9   been condensed.

10          Shira, can you actually take the  
11   version that we have, print the PDF, re-save?

12          MS. GELFAND: Sure.

13          MS. GREENE: We'll try opening it  
14   that way. So you can close out of there for  
15   now. We'll wait and while she does that,  
16   we'll come back to this document and I think  
17   if we look at it as a PDF print we might have  
18   better success.

19          MR. GAGE: Do you want to continue on  
20   something else, do you want to take a break  
21   while we're doing that? What's the --

22          MS. GREENE: What my plan was, was to  
23   take another -- let me just check out a few  
24   other documents to make sure I'm not going to  
25   have a similar problem, so just give me one

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1 - ADAM LIEF -

2 moment.

3 Okay. All right, why don't we just  
4 move on to a different one. For the record,  
5 Ken and Sara, in the document that's been  
6 Bates stamped as Google 58501 which is  
7 a -- also a native file Excel spreadsheet,  
8 for use in today's deposition we have pulled  
9 out specific job descriptions and PDFed them  
10 to you separately. So they're not going to  
11 have a separate exhibit -- they'll have  
12 separate exhibit numbers, but they won't have  
13 separate Bates stamp numbers; but the native  
14 file from which it was extracted is again  
15 58501. Is that clear to you -- to you, Mr.  
16 Gage?

17 MR. GAGE: Yes. I mean, I understand  
18 what you just described to me. I mean,  
19 I --

20 MS. GREENE: Then I'm going to go  
21 ahead and move into the shared exhibits and  
22 if you go now to the shared exhibits and  
23 refresh, we should be able to see was marked  
24 as Exhibit DEF 14.

25 MR. GAGE: Go ahead.

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1 - ADAM LIEF -

2 MS. GREENE: We will mark this as the  
3 next exhibit.

4 (Whereupon Exhibit 4 was marked at  
5 this time.)

6 Q. This also is very small, but again if  
7 you expand up to full screen and then increase  
8 your magnification you should be able to read the  
9 field. Are you able to do that, Mr. Lief?

10 A. Yes, I can.

11 Q. So this is job opening ID 967381 from  
12 the native file bearing the Bates stamp 58501.

13 (Whereupon Exhibit 4 was marked at  
14 this time.)

15 Q. Mr. Lief, have you seen this or a  
16 similar-type document to this before?

17 A. I've seen job postings before, but  
18 not -- not this document.

19 Q. Have you seen it in this format  
20 before?

21 A. No, I have not.

22 Q. Do the application engineer  
23 directors -- are you aware of instances where the  
24 external directors or names that are used are  
25 different than application engineer directors?

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1                   - ADAM LIEF -

2                   MR. GAGE: Objection.

3           A.     I'm not aware of -- of that  
4 difference.

5           Q.     Are you aware with respect to job  
6 postings for application engineer directors, is it  
7 posted as a general director position or is it  
8 posted as an application engineer director?

9           A.     I'm not -- I'm not sure.

10          Q.     Have you seen job postings for  
11 application engineer director position?

12          A.     I have.

13          Q.     Do you know what the job opening is  
14 that is listed for such position?

15          A.     I don't.

16          Q.     Do you know what the job role is  
17 titled?

18                 MR. GAGE: Objection.

19          A.     I don't.

20          Q.     Do you know what the title is that's  
21 used?

22                 MR. GAGE: Objection.

23          A.     I don't.

24          Q.     Who at -- have you -- have you been  
25 involved in the creation of any job openings --

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2 Q. Okay. Now, if you zoom in are you  
3 able to --

4 MR. GAGE: Which one is it? Mine is  
5 still refreshing.

6 MS. GREENE: 58455.

7 MR. GAGE: Okay. So it does not have  
8 an exhibit tab or number on it?

9 MS. GREENE: Correct.

10 MR. GAGE: Okay, I've got it.

11 A. I've got it too.

12 MS. GREENE: It's the PDF that we  
13 tried to look at earlier.

14 Q. Mr. Lief, do you recognize this  
15 document?

16 A. I do, but just note that this is only  
17 part of the document. I think when it was PDFed,  
18 you're missing kind of the -- the top, a bunch of  
19 lines on top.

20 Q. Okay. What do you see is missing  
21 from this document?

22 MR. GAGE: Objection.

23 A. There were -- where it says  
24 "Organizational Impact," before that there were  
25 three other categories; one is "Leadership &

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2 Influence," one is "Complexity & Scope," one is  
3 "Knowledge & Experience." They all have rows and  
4 sample activities for them.

5 Q. Okay. What do you recognize this  
6 document to be?

7 MR. GAGE: Objection.

8 Q. Or an excerpt of, what you recognize  
9 it to be an excerpt of?

10 A. I recognize it as an excerpt of the  
11 application engineer manager ladder document.

12 Q. Okay, and so when you were earlier  
13 testifying about the ladder, some form of  
14 this -- this document is what you were referring  
15 to; is that correct?

16 A. Cara, you were breaking up. Could  
17 you please repeat that? Sorry.

18 Q. Sure. Appreciating that you've  
19 testified that there are things missing from this  
20 document, this -- this document nonetheless is  
21 what you were referring to when you were referring  
22 to the ladder earlier?

23 A. Yes, that's correct.

24 Q. Okay, and this is the ladder -- we're  
25 going to work on getting the -- the pieces that

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2   you testified are missing and we'll do that at the  
3   lunch break, but for now this is a piece of the  
4   ladder as it relates to application engineers,  
5   correct?

6           MR. GAGE: Cara, objection.

7       A.   That's correct.

8       Q.   Okay, so why don't you put that aside  
9   for now.

10           I'm going to share a different  
11   document with you and if you refresh, it should be  
12   in there now. This we will marked as -- this is  
13   Exhibit 6, Bates stamped P0001584. Do you  
14   recognize this document?

15           (Whereupon, Exhibit 6 was marked at  
16   this time.)

17       A.   Yes, I do.

18       Q.   And what do you recognize this to be?

19       A.   This is the Google-Wide Engineering  
20   Levelling Guide.

21       Q.   And outside of your preparation for  
22   your deposition today, have you seen this document  
23   before?

24       A.   Cara, could you please repeat that?  
25   I'm sorry.



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2 A. One moment to look through.

3 Well, it doesn't appear to be listed.

4 Q. Would it fall under Eng manager, do  
5 you know?

6 A. For a director level role yes, but  
7 there should be -- under that there should be  
8 application engineering rubrics too, so either  
9 they're misgrouped or just not on the -- not on  
10 this site.

11 Q. Do you see where it says "Jobs  
12 Families Covered," under rubric-level guidelines  
13 that chart?

14 A. Yes, yes. I got it, yes.

15 Q. What does "Job Families" refer to?  
16 Do you know?

17 A. Job families is -- it's a grouping of  
18 jobs with the same focus. It's kind of akin to  
19 the ladder. The ladder describes the family.

20 Q. So a ladder describes the family; is  
21 that -- is that correct?

22 MR. GAGE: Objection.

23 A. That's correct.

24 Q. So what is the family that the  
25 application engineer director sits within?

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2 director, how would you describe that?

3 A. I'd say a combination of engineering  
4 management, program progression, stakeholder  
5 interaction, and planning and strategy would tend  
6 to make up the day.

7 Q. And if you were to describe to  
8 someone the skills that were necessary for an  
9 application engineer director, what would those  
10 skills be?

11 A. We would expect technical skills  
12 commensurate with being able to manage engineers,  
13 functional skills for the domain, leadership  
14 acumen, and excellent communication skills at high  
15 level.

16 Q. Are -- is there a minimum number of  
17 years of experience that someone needs to have to  
18 be an applications engineer director Level 8?

19 A. So we have guidelines for that,  
20 however it is not a hard minimum.

21 Q. And with respect to the  
22 engineering-levelling guidelines that we looked at  
23 before, would years of experience be one of  
24 the, the -- do you recall one of the components on  
25 that?

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2 MR. GAGE: Do you have the document  
3 handy so we could take a look at it? Which  
4 exhibit?

5 MS. GREENE: Give me one moment.

6 I believe 25, Exhibit 25 in  
7 the -- it's marked as Exhibit 6 for this  
8 deposition.

9 A. Yes. Thank you for that, Cara. It's  
10 not.

11 Q. With respect to engineering  
12 management for the application engineer director  
13 role, what percentage of the job would you say  
14 relates to engineering management?

15 A. To clarify, you mean as opposed to  
16 the other elements I stated like stakeholders and  
17 things like that?

18 Q. Right. So I think you -- you had  
19 said that the day-to-day kind of role of the job  
20 involved a combination of engineering management,  
21 planning, and strategy.

22 A. And stakeholding management -- yeah,  
23 got it. I -- personal for engineering management,  
24 let me think just a moment.

25 Probably 40 percent.

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2 Q. What percentage involves planning and  
3 strategy? And if you need to break those out, you  
4 can. I don't know if that's one category or two.

5 A. I think about it as one category, so  
6 probably 20 percent.

7 Q. And what percentage involves  
8 stakeholder management?

9 A. Probably another 20 percent.

10 Q. And with respect to the remaining 20  
11 percent, what's -- what's encapsulated in that?

12 A. I think it's mostly the program  
13 execution functions.

14 Q. Okay.

15 MS. GREENE: I've made good time.  
16 What I would like to do is take a short break  
17 to go back through my notes and finish  
18 what -- target exactly what I need to cover  
19 in the remaining minutes left. I don't have  
20 much more to go through. So if we could take  
21 a five-minute break so I can do that, we'll  
22 come back and we'll -- we'll clean up  
23 whatever left we have and be out of here by  
24 4:30.

25 MR. GAGE: Okay, we'll be back in

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2 purchased software product from another company.

3 Q. And what do you mean by "domain"?

4 A. Domain refers to a part of the

5 business operations such as HR, finance,

6 marketing, legal.

7 Q. Anything else?

8 A. The -- maybe the other aspect is

9 about integration. Because we have both

10 first-party and third-party systems, integration

11 between the two becomes a very important skill set

12 for application engineer.

13 There's one other criteria also that

14 is important is that we are heavily internally

15 focused. So our products and our development is

16 for Google's internal use, not for selling to

17 customers or external use in any way.

18 Q. Okay. Is that it?

19 A. That's it.

20 Q. You've been a Level 8 director for

21 how many years?

22 A. About three-and-a half-years I

23 believe, since 2017.

24

25

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF ADAM LIEF  
PURSUANT TO 28 U.S.C. § 1746**

I, ADAM LIEF, declare under penalty of perjury that I have read the entire transcript of my testimony taken under oath in my deposition on October 2, 2020, in the above-captioned matter; that the same is a true, complete and correct record of my testimony save and except for corrections as indicated by me on the enclosed Errata Sheet, with the understanding that I offer these changes as if still under oath; and that the answers on the record as given by me and as amended by the corrections indicated on the enclosed Errata Sheet are true and correct.

Signed on the 9<sup>th</sup> day of November, 2020 in Los Altos, California.

DocuSigned by:

*Adam Lief*

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Adam Lief